

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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JAN 25 2024 Jxm

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Bey, Hauvikaal Mu

Bey, SYANSONDA MU

Plaintiff(s),

vs.

Case No.

Circuit Court (Probate DN)

2023PC008314

1:24-cv-00657

Judge Martha M. Pacold

Magistrate Judge Jeffrey T. Gilbert

CAT. 2 / RANDOM

Defendant(s).

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Hauvikaal Mu Bey.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

4. Defendant, SUSAN KENNEDY - SULLIVAN, is
(name, badge number if known)
- ☐ an officer or official employed by Circuit Court of;
(department or agency of government)
COOK COUNTY PROBATE or
- ☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is COOK COUNTY. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 1-2-2024, at approximately 11:00 ☒ a.m. ☐ p.m.
(month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of _____
CHICAGO, IL, in the County of COOK,

State of Illinois, at 7413 S BERRY AVE, CHGO IL 60649,
(identify location as precisely as possible)

2001 CALL
PASSWORD 328621
when defendant violated plaintiff's civil rights as follows (Place X in each box that applies):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged):*

COOK COUNTY CODE OF
ETHICS AND VIOLATIONS OF BEST PRACTICES

8. Plaintiff was charged with one or more crimes, specifically:

THREATENED WAS FALSE ELDER ABUSE
CHARGES. WHICH WERE COMPOSED WITHOUT
MERIT.

9. *(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")* The criminal proceedings

☒ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows _____

☐ Other: _____

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

10. Plaintiff further alleges as follows: (Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)

On 1/2/2024 at 11:00 AM I Darrinibal the Boy did present myself on Special Videocon to a 2001 call with Cook County Circuit Court Judge Sullivan. Myself and my brother were co-producers for Guardianship of our 45yr old mom with Dementia. I was told by the County that I need a lawyer in order to be heard on this case and I had open this case as a pro se litigant and received a fee waiver as a pro se litigant and once in court I was told I need a lawyer and I was told by Judge Sullivan to be charged with Elder Abuse. The Federal Question at hand is should I be forced to hire an attorney when I don't have the resources.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Plaintiff was falsely accused of a elder abuse and being mentally ill. My name was slandered and my reputation was damaged and I was demonized and demonized for trying to protect my mom with Dementia.

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☐ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: _____

Plaintiff's name (print clearly or type):

Plaintiff's mailing address: _____

City Chicago

State IL

ZIP 60649

Plaintiff's telephone number: (305) 879-3114.

Plaintiff's email address (if you prefer to be contacted by email): _____

BEYHAKIMIBAL2@GMAIL.COM

15. Plaintiff has previously filed a case in this district. ☒ Yes ☐ No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.

